Case: 1:12-cv-07328 Document #: 35-1 Filed: 01/15/13 Page 1 of 3 PageID #:239

## **APPENDIX A**

WWR #:9220999

٧.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS MUNICIPAL DEPARTMENT, FIRST DISTRICT

LVNV FUNDING LLC

Plaintiff,

11Ml 172341

No,

Amount Claimed: \$2,688.87

Return Date:

PAMELA CASSO

Defendant.

## VERIFIED COMPLAINT

The Plaintiff, LVNV FUNDING LLC, by its attorneys, Weltman, Weinberg & Reis Co., L.P.A., complains of the Defendant, PAMELA CASSO, as follows:

- 1. Plaintiff, LVNV FUNDING LLC, ("Plaintiff") is a corporation authorized to transact business in the State of Illinois.
- 2. Defendant, PAMELA CASSO ("Defendant") is an individual, and on information and belief, resides in the Cook County, Illinois.
- 3. The Defendant opened an Account with CITIBANK whereby Defendant could purchase goods and services on their Account and/or receive cash advances.
  - 4. Defendant made various purchases and/or cash advances on the Account.
- 5. The Account was assigned to Plaintiff for value, and Plaintiff is now the actual bona fide owner of the Account.
- 6. As of the most recent statement of account, the Defendant owes funds to Plaintiff. (See copy of Account Statement attached as Exhibit "A".)
  - 7. Interest accrues on the credit line at an annual percentage rate of 5%.

8. As of October 27, 2011, the balance currently due to Plaintiff is as follows:

Principal balance \$2,440.48 Accrued interest \$248,39 Total amount due \$2,688.87

9. Defendant made no further payments to Plaintiff despite due demand.

WHEREFORE, Plaintiff prays for Judgment against the Defendant, PAMELA CASSO, in the amount of \$2,688.87, plus interest of 5% on the principal amount due from October 27, 2011, through date of judgment, plus court costs.

Attorney for Plaintiff

WELTMAN, WEINBERG & REIS CO., L.P.A. 180 N. LaSalle Street, Suite 2400 Chicago, Illinois 60601 312-782-9676 Atty. No. 31495 MM INITIAL:ALY

This law firm is a debt collector attempting to collect this debt for our client and any information obtained will be used for that purpose.